John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/4/2013

Certified Mail

Yes	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Kenneth Turner
AMPAC Packaging LLC
12025 TRICON RD
Cincinnati, OH 45246

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431420497
Permit Number: P0115392
Permit Type: OAC Chapter 3745-31 Modification
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE
12/4/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

AMPAC Packaging LLC
12025 TRICON RD,
Cincinnati, OH 45246
Hamilton County
FACILITY DESC.: Plastics Bag Manufacturing
PERMIT #: P0115392
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Chapter 31 modification for six flexographic printing presses being completed at renewal. Only change is adding K022 to group limit with the other presses to make recordkeeping easier for facility. Since group limit in place, all emission units need modification.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMPAC Packaging LLC

Facility ID:	1431420497
Permit Number:	P0115392
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/4/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMPAC Packaging LLC

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Authorization

Facility ID:	1431420497
Application Number(s):	A0048403
Permit Number:	P0115392
Permit Description:	Chapter 31 modification for six flexographic printing presses being completed at renewal. Only change is adding K022 to group limit with the other presses to make recordkeeping easier for facility. Since group limit in place, all emission units need modification.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	12/4/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

AMPAC Packaging LLC
12025 TRICON RD
Cincinnati, OH 45246

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115392
Permit Description: Chapter 31 modification for six flexographic printing presses being completed at renewal. Only change is adding K022 to group limit with the other presses to make recordkeeping easier for facility. Since group limit in place, all emission units need modification.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K006**
Company Equipment ID:	Flexographic Press #6
Superseded Permit Number:	P0100115
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K013**
Company Equipment ID:	Flexographic Press #12
Superseded Permit Number:	P0100115
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K014**
Company Equipment ID:	Flexographic Press #3
Superseded Permit Number:	P0100116
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K019**
Company Equipment ID:	Flexographic Press #14
Superseded Permit Number:	P0100114
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K020**
Company Equipment ID:	Flexographic Press #15
Superseded Permit Number:	P0108971
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K022**
Company Equipment ID:	Printing Press #16
Superseded Permit Number:	P0107994
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 2, 3, 4 and 5.

2. The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K006, K013, K014, K019, K020 and K022 and all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2:

   a) The name and identification number of each coating employed.

   b) The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied.

   c) The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum of all individual HAP contents from (b)].

   d) The number of gallons of each coating employed.

   e) The name and identification of each cleanup material employed.

   f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

   g) The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].

   h) The number of gallons of each cleanup material employed [the total number of gallons of each cleanup material employed less the number of gallons of each cleanup material collected for reuse and disposal].

   i) The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) times the

emission factor or overall control efficiency** (if applicable) for each coating plus the sum of (f) times (h) for each cleanup material plus individual HAP emissions from any de minimus, registration status and/or permit exempt emissions unit at the facility].

j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) times the emission factor or overall control efficiency** (if applicable) for each coating plus the sum of (g) times (h) for each cleanup material plus combined HAP emissions from any de minimus, registration status and/or permit exempt emissions unit at the facility].

k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

l) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept on an individual emissions unit basis.

** Overall control efficiency shall be from the most recent performance test that demonstrated that the emissions unit was in compliance.

4. The permittee shall submit deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in 2.

   If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

   The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Compliance with the emission limitations specified in 2. shall be determined in accordance with the following methods:

   a) Emission Limitation:

      9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs.

      Applicable Compliance Method:

      Compliance with the HAP emission limitations in 2.shall be demonstrated by the record keeping in 3.

C. Emissions Unit Terms and Conditions

1. K006, Flexographic Press #6

Operations, Property and/or Equipment Description:

60 Inch 2 Color Flexographic Printing Press No. 6

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), d)(2), e)(2), f)(1)b. and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and area source requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63, Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)e.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage and emission limitations.

d. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

e. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(2) The permittee shall collect and record the following information each month for the identified emissions units in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(3) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.;

ii. VOC emission limitation outlined in b)(2)b.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the hourly coating rate by the VOC content of the ink. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirement in section d)(2)e.

b. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

(2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

2. K013, Flexographic Press #12

Operations, Property and/or Equipment Description:

57 Inch 8 Color Flexographic Printing Press No. 12

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), d)(2), e)(2), f)(1)b. and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and area source requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63 ,Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)e.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage limitations and emission limitations.

d. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

e. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(2) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(3) The federally enforceable permit to install and operate (FEPTIO) for this emissions unit, K013, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 0.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 103.3

MAGLC (ug/m3): 414.5

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

d. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.;

ii. VOC emission limitation outlined in b)(2)b.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the hourly coating rate by the VOC content of the ink. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirement in section d)(2)e.

b. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

(2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

3. K014, Flexographic Press #3

Operations, Property and/or Equipment Description:

6 Color Flexographic Printing press No. 3

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), d)(2), e)(2), f)(1)b. and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and area source requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63 ,Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)e.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage limitations and emission limitations.

d. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

e. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(2) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(3) The federally enforceable permit to install and operate (FEPTIO) for this emissions unit, K014, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 0.64

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 103.3

MAGLC (ug/m3): 414.5

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

d. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.;

ii. VOC emission limitation outlined in b)(2)b.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 5.46 pounds per hour and 23.91 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the hourly coating rate by the VOC content of the ink. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirement in section d)(2)e.

b. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emissions limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

(2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

4. K019, Flexographic Press #14

Operations, Property and/or Equipment Description:

6 Color Flexographic Printing Press No. 14

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), d)(2), e)(2), f)(1)b. and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 4.76 pounds per hour and 20.85 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and area source requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63 ,Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)e.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage limitations and emission limitations.

d. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

e. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(2) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(3) The federally enforceable permit to install and operate (FEPTIO) for this emissions unit, K019, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 0.466

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50

MAGLC (ug/m3): 414.5

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as

documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

d. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

e. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.;

ii. VOC emission limitation outlined in b)(2)b.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 4.76 pounds per hour and 20.85 tons per year.

Applicable Compliance Method:

b. Compliance with the hourly emission limitation shall be determined by multiplying the hourly coating rate by the VOC content of the ink. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirement in section d)(2)e.

c. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

e. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

(2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

5. K020, Flexographic Press #15

Operations, Property and/or Equipment Description:

6 Color Flexographic Printing Press No. 15

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., b)(2)b., c)(1), d)(1), d)(2), e)(2), f)(1)b. and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 4.76 pounds per hour and 20.85 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(Y)(1)(a), OAC rule 3745-31-05(D) and area source requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid 40 CFR Part 63, Subpart KK and Title V.	See Section B.2., b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(Y)(1)(a)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)e.

(2) Additional Terms and Conditions

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of the compliance coating, usage limitations and emission limitations.

d. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

e. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(2) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(3) The permit to install for this emissions unit K020 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ammonia
TLV (mg/m3): 17,434
Maximum Hourly Emission Rate (lb/hr): 0.476
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 351
MAGLC (ug/m3): 415

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimus level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

d. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

e. b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

f. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

(4) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the

potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.;

ii. VOC emission limitation outlined in b)(2)b.; and

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1).

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 4.76 pounds per hour and 20.85 tons per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the hourly coating rate by the VOC content of the ink. Compliance with the annual emission limitation shall be demonstrated by the record keeping requirement in section d)(2)e.

b. Emission Limitation:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emissions limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

d. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

(2) Compliance with the coating usage limitation in c)(1) shall be demonstrated by the recordkeeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

6. K022, Printing Press #16

Operations, Property and/or Equipment Description:

Four Color, 1200mm wide Flexographic Printing Press #16

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4) through d)(7).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., b)(2)c., c)(1), d)(1), d)(2), e)(2), f)(1)b and f)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The VOC emissions shall not exceed 1.83 tons per month average over a 12-month period.
b.	OAC rule 3745-31-05(D)	See Section B.2.
c.	OAC rule 3745-21-09(Y)(1)	See b)(2)a.
d.	40 CFR Part 63 Subpart KK	See b)(2)d.

a. The VOC content of any ink or coating employed in the printing line(s) shall not exceed one of the following limitations:

i. 40% VOC by volume of the coatings and inks, excluding water and exempt solvents, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,5}$; or

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

ii. 25% VOC by volume of the volatile matter in the coatings and inks, as determined under paragraph (B) of OAC rule 3745-21-10 of the Administrative Code for $C_{VOC,6}$.

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

b. The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

c. The hourly and annual emission limitations are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

d. The permittee commits to and meets the criteria to be considered an area source for Hazardous Air Pollutants, and is subject only to the record keeping and reporting provisions in 40 CFR 63.829(d) and 40 CFR 63.830(b)(1).

c) Operational Restrictions

(1) The maximum combined annual coating usage from flexographic printing presses emissions units K006, K013, K014, K019, K020 and K022 shall not exceed 250,000 gallons per year, based upon a rolling, 12-month summation of the coating usage figures.

d) Monitoring and/or Recordkeeping Requirements

(1) The record of the calculation from paragraph (B) of OAC rule 3745-21-10, for the VOC content of each coating and ink applied, by volume of coating and ink (excluding water and exempt solvents), $C_{VOC,5}$, or by volume of the volatile matter of in the coatings/inks, $C_{VOC,6,}$ shall be maintained on file and shall be made available upon request. The VOC content shall be determined by using U.S. EPA Method 24A for the flexographic and rotogravure printing inks and coatings; or the ink/coating formulation data from the manufacturer may be used if based on the same method.

(2) The permittee shall maintain monthly records of the following information for the emissions units listed in c)(1):

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage.

(3) The permittee shall collect and record the following information each month for the emissions units identified in b)(2)b.:

a. The name and identification number for each coating and cleanup material employed.

b. The VOC content of the coatings and cleanup materials used in pounds per gallon, as applied.

c. The percent VOC by volume of each coating and cleanup material (excluding water and exempt solvents), as applied or the percent VOC by volume of the volatile matter in the coating.

d. The number of gallons of each coating and cleanup material employed.

e. The total combined VOC emissions, in pounds or tons per month [the sum of (b) times (d) for each coating and cleanup material].

(4) The permittee shall collect and record the following information each month for this emissions unit:

a. The total VOC emissions, in pounds or tons per month average over a 12-month rolling period.

(5) The permit-to-install and operate (PTIO)application for this emissions unit, K022, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: ammonia

TLV (mg/m3): 17.41

Maximum Hourly Emission Rate (lbs/hr): 0.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 44.26

MAGLC (ug/m3): 414.5

The permittee, has demonstrated that emissions of ammonia, from emissions unit K022, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC

3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. HAP emission limitation outlined in Section B.2.

ii. VOC emission limitation outlined in b)(2)b.;

iii. The maximum combined annual coating usage of 250,000 gallons coating outlined in c)(1); and

iv. The total VOC emissions, in pounds or tons per month average over a 12-month rolling period.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

The combined annual VOC emissions from flexographic printing presses K006, K013, K014, K019, K020 and K022 shall not exceed 8 tons per month and 96 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual emission limitations shall be demonstrated by the recordkeeping requirements specified in d)(1) and d)(2). Compliance with the monthly limitation ensures compliance with the annual limitation.

b. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 40% VOC by volume of the ink, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,5} = (100)(V_{VOC}) / (V_S + V_{VOC})$

Where:

$C_{VOC,5}$ is the VOC content in percentage VOC by volume of the coating, excluding water and exempt solvents

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_S is the volume fraction of solids (nonvolatile matter) in ink, in gallon of solids per gallon of ink

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink

c. Emission Limitation:

The VOC content of the inks employed in the printing line(s) shall not exceed 25% VOC by volume of the volatile matter in the ink.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(2). If required, compliance with the VOC content limitation shall be determined using U.S. EPA Method 24A for flexographic and rotogravure printing inks and coatings or the formulation data from the manufacturer, the VOC content shall be calculated as follows:

$C_{VOC,6} = (100)(V_{VOC}) / V_{VM}$

Where:

$C_{VOC,6}$ is the VOC content in percentage VOC by volume of the volatile matter

V_{VOC} is the volume fraction of VOC in the ink, calculated as:

$V_{VOC} = V_{VM} – V_W - V_{ES}$

V_{VM} is the volume fraction of volatile matter in ink, in gallon of volatile matter per gallon of ink

V_W is the volume fraction of water in ink, in gallon of water per gallon of ink

V_{ES} is the volume fraction of exempt solvent in ink, in gallon of exempt solvent per gallon of ink.

d. Emission Limitation:

The VOC emissions shall not exceed 1.83 tons per month average over a 12-month period.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be demonstrated by the record keeping requirements established in d)(4).

(2) Compliance with the coating usage limitation in b)(2)b. shall be demonstrated by the recordkeeping requirements specified in d)(2).

g) Miscellaneous Requirements

(1) None.